



HR Privacy Notice

This privacy notice explains how and why Preston Turnbull uses personal data about our employees and job applicants. As an employer, we need to collect and process data about you. We are committed to being transparent about how we do this and the steps that we take to protect your privacy.

We collect, process and manage information for the staff of Preston Turnbull. This includes partners, consultants, employees, future employees, vac scheme students, volunteers and work experience/workplace placements.

As your employer, we use several IT systems and hold paper records. This includes a self-service portal which enables you to manage your own information.

When you apply for a job with us, your application is held electronically.

All information is kept in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations (PECR), the Data (Use and Access) Act 2025 and any other applicable UK data protection legislation.

We collect and process information from you in order to perform our contractual duties, to comply with our legal obligations, for the purposes of our legitimate interests or recognised legitimate interests where applicable, and (where necessary) with your consent.

What information do we collect about you?

We collect and process a range of personal data about you. We cannot administer our employment or other relationship with you without your personal data.

The categories of information that we collect, process, hold and share include:

- Personal information: name, address, email addresses, telephone numbers, emergency contact details, next of kin information, ID.
- Special categories of data including gender, age (date of birth), ethnic group, criminal records/DBS checks (where required), any work-related disability information.
- Professional/Qualifications: education, qualifications, work experience, SRA number, details of any other professional membership, performance management information, details of any training/further education taken with the firm.
- Recruitment information: selection and induction documents, job offer and details of your nationality and evidence of right to work in the UK.
- Contract information: start dates, hours worked, job title, roles, promotions, salary information, tax code, NI number.



- Details of your bank account.
- Absence information: number of absences and reasons including holiday, medical and any other leave from the office.
- Medical information: details of any accidents at work, illnesses/injuries resulting in absence from the office. Also including any medical or health conditions, and details of any disability for which we need to make reasonable adjustments.
- Performance information: including appraisals, performance reviews and any related correspondence.
- Details of any assessments carried out, i.e., workstation assessments.
- Details of termination of employment.

We collect this information in a variety of ways. We collect personal data during the recruitment process through CVs and covering letters, from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment, from correspondence with you or through interviews, meetings, or other assessments from third parties such as references, and criminal records checks permitted by law.

For employees, personal data will be stored in a range of different places, including in your HR file, in our HR management systems and in other IT systems (including our email system).

Why we collect and use this information

We are required by law to always have a lawful basis for processing your personal data.

Job Applicants:

As part of any recruitment process, we will collect and process personal data relating to you as a job applicant. We will also need to take steps at your request prior to entering into an employment contract with you. Processing personal data from job applicants allows us to manage the recruitment process, assess and confirm your suitability for employment and decide to whom to offer a job. We may need to process personal data from job applicants to respond to and defend against legal claims. Your personal data will not be used for any purpose other than the recruitment exercise for which you have applied.

It is therefore in our **legitimate interests** to decide whether to appoint you to the role applied for since it would be beneficial to our business to appoint someone to that role.

We also need to process personal data to ensure that we comply with our legal obligations. For example, we must check your entitlement to work in the UK before offering you a job with us. We therefore process your personal data for this purpose to ensure that we are **complying with a legal obligation**.



Employees:

We need to process your personal data to be able to enter into an employment contract with you and to meet our obligations under your employment contract.

Where we rely on **legitimate interests**, we do so only where the processing is necessary for a legitimate business purpose and where your interests, rights and freedoms do not override those interests. Where the Data (Use and Access) Act 2025 provides for a recognised legitimate interest, we may rely on that basis where applicable, provided the processing is necessary and all other UK data protection requirements are met. Our legitimate interests include being able to enter into an employment contract with you and to:

- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of training, including mandatory training prescribed by legislation and regulation;
- conduct surveys and data analytics to review and better understand employee retention, engagement and attrition rates;
- obtain occupational health advice, to ensure that we comply with our duties in relation to individuals with disabilities, meet our obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that we comply with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;



- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

We also process your personal data in order for us to be able **to perform the contract we have with you** for the following purposes:

- to pay you in accordance with your employment contract;
- to administer benefits and pensions;
- to operate and keep a record of absence and absence management procedures;
- to operate and keep a record of disciplinary and grievance processes; and
- to operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave).

We also need to process personal data to ensure that we comply with our legal obligations. For example, we must check your entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable you to take periods of leave to which you are entitled. We therefore process your personal data to ensure that we are **complying with a legal obligation**.

Special Category Data:

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities).

We process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, for the purposes of equal opportunities monitoring. For these purposes we rely on the following legal basis for processing your personal data:

- for the performance of a task carried out in the public interest;
- processing is necessary for reasons of substantial public interest; and
- processing is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment.

We also process special categories of personal data pertaining to occupational health. For these purposes, we rely on the following legal bases for processing your personal data:

- for the purposes of our legitimate interests;



- processing is necessary for carrying out the obligations and exercising specific rights of us or you in the field of employment; and
- processing is necessary for health or social care reasons including preventative or occupational medicine.

We also process information regarding DBS checks, criminal convictions and regulatory breaches – this information is used to ensure compliance with our regulatory and legislative obligations.

Use of artificial intelligence (AI)

Preston Turnbull may use approved artificial intelligence (AI) tools to support administrative activities, legal service delivery, drafting, document review, legal research, data analysis, HR administration and other legitimate business purposes.

- they operate under human oversight;
- staff remain responsible for reviewing and validating outputs;
- personal data will only be processed through AI systems approved by the firm;
- confidential and client information must only be used in accordance with the firm's AI Policy, Information Security Policy and client confidentiality obligations; and
- AI is not used to make solely automated decisions that produce legal or similarly significant effects in relation to employees.

Automated decision-making

We do not make employment decisions based solely on automated processing. Recruitment, performance management, disciplinary action and other employment decisions always involve meaningful human review.

The firm does not use AI for employee surveillance or monitoring unless this has been specifically notified to affected individuals and is legally permitted.

Storing and sharing

All information held is kept safely and securely. Access to this information is available only to those individuals with approved access and as appropriate, i.e., HR and Partners. HR information and documentation is kept online via PeopleHR and in a secure folder on SharePoint.

Individual anonymity will always be maintained when using data to compile statistical data or information.

We routinely share your information with:



- Hilliers Hopkins who administer our Payroll.
- Legal advisers.
- Insurance providers.
- HMRC.
- Pension providers.
- Benefit providers.
- Health professionals.
- SRA/Law Society.

We only share your personal data where we have a legal basis for doing so, or where there is no legal basis with your consent.

International transfers

Where necessary for employment, HR administration, legal, regulatory, payroll, benefits, IT, business continuity or other legitimate business purposes, we may transfer or make personal data accessible outside the United Kingdom, including to employees or service providers based overseas, such as in Switzerland.

Where personal data is transferred internationally, we will ensure that appropriate safeguards are in place. These may include an adequacy decision, international data transfer agreements, standard contractual clauses, transfer risk assessments or other safeguards permitted by applicable UK data protection legislation.

All third-party suppliers are monitored and vetted to ensure that they comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations (PECR), the Data (Use and Access) Act 2025 and any other applicable UK data protection legislation.

Retention periods

Documentation relating to the recruitment and selection process is retained for a maximum of 12 months to enable us to provide feedback to interested candidates and to demonstrate compliance with non-discrimination/Equality & Diversity policy.

All documentation/correspondence relating to recruitment, selection, induction, training, performance management, absence from the office, accident records and disciplinary/grievances will be kept for the duration of employment with the firm, and for a period of 6 years after employment ceases.



All documentation/correspondence relating to accounts, including HMRC records and correspondence, wages and salary records, statutory sick pay and maternity/paternity/shared parental leave will be kept for 6 years after the end of the financial year to which it relates.

Pension scheme information will be kept for 12 years from the end of any benefit payable under the policy.

Exit interviews and other end of employment documentation will be maintained, along with other HR records, for a period of 6 years following the end of employment with Preston Turnbull.

Electronic data/emails are kept indefinitely in our archive/cloud service provider.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact either the Operations Director or the HR, Risk and Compliance Director.

If you believe your personal data has been processed incorrectly or wish to raise a complaint regarding privacy, confidentiality, marketing or the handling of your personal information, you should notify the HR, Risk & Compliance Director or Operations Director immediately so that the matter can be investigated.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress.
- Withdraw consent.
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed.

Monitoring and updates

We continuously monitor our policies and procedures and may update this privacy notice as required by legislation, good practice guidelines and HR guidance. Updates will be published internally via PeopleHR or email.

If you have any concerns about the way we are collecting or using your personal data, we ask that you raise your concern with the HR, Risk and Compliance Director in the first instance. Alternatively, you can contact the Information Commissioner's Office.